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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BALLY MANUFACTURING CORPORATION,)
Plaintiff,)
v.) CIVIL ACTION NO. 78 C 2246 ✓
D. GOTTLIEB & CO.,)
WILLIAMS ELECTRONICS, INC.)
and)
ROCKWELL INTERNATIONAL CORPORATION,)
Defendants.)
and)
BALLY MANUFACTURING CORPORATION,)
Plaintiff,)
v.) CIVIL ACTION NO. 79 C 713 ✓
GAME PLAN, INCORPORATED,)
Defendants.)

NOTICE OF DEPOSITION IN BALLY v. GAME PLAN CASE

TO: Gerson E. Meyers, Esq.
Dressler, Goldsmith, Clement,
Gordon & Shore, Ltd.
1800 Prudential Plaza
Chicago, Illinois 60601

John F. Lynch, Esq.
Arnold, White & Durkee
2100 Transco Tower
Houston, Texas 77056

Melvin M. Goldenberg, Esq.
McDougall, Hersh & Scott
135 South LaSalle Street
Suite 1540
Chicago, Illinois 60603

Howard Arvey, Esq.
Arvey, Hodes, Costello &
Burman
180 North LaSalle Street
Chicago, Illinois 60601

PLEASE TAKE NOTICE that at 10:00 a.m. on the 16th day of September, 1980, at the offices of Limbach, Limbach & Sutton, Suite 300, 2600 El Camino Real, California 94306, or other place so agreed to by counsel for the parties, the plaintiff, Bally Manufacturing Corporation, in the above-entitled action will take the deposition of Manuel R. Lemas upon oral examination pursuant to the Federal Rules of Civil Procedure before a notary public or other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed or until adjourned by Attorney for Plaintiff.

The witness is requested to bring with him to the deposition all documents and things listed in Exhibit A attached hereto.

You are invited to attend and cross-examine.

BALLY MANUFACTURING CORPORATION

Jerold B. Schnayer

Donald L. Welsh
A. Sidney Katz
Jerold B. Schnayer
Fitch, Even, Tabin, Flannery & Welsh
135 South LaSalle Street
Chicago, Illinois 60603
(312) 372-7842

Attorneys for Plaintiff

September 2, 1980

EXHIBIT A

1. Any and all documents which were generated between January 1, 1973 and June 30, 1975 and which refer or relate to the application of microprocessor technology to pinball machines.

2. Any and all documents which were generated between January 1, 1973 and June 30, 1975 concerning microprocessor technology and referring or relating to contacts or communications of employees or agents of Compata, Incorporated or Micro Computer Associates with any of the following companies:

- A. Cyan Engineering, Grass Valley, California
- B. Atari
- C. Ramtek Corporation
- D. Dave Nutting Associates
- E. Milwaukee Coin Industries (MCI), Milwaukee, Wisconsin
- F. Intel
- G. Dr. Phil T. Tai

3. Any and all documents relating or referring to the subject matter of courses taught by either Manuel R. Lemas or Raymond M. Holt concerning microprocessor technology including but not limited to Intel Microcomputer Workshops.

4. Any and all documents relating or referring to courses taught by either Manuel R. Lemas or Raymond M. Holt concerning microprocessor technology including but not limited to Intel Microcomputer Workshops.

5. Any and all documents referring or relating to contacts or communications of either Raymond M. Holt or Manuel R. Lemas with Dr. Phil T. Tai.

6. Any and all documents referring or relating to the selection, collection, or gathering of documents in response to this subpoena duces tecum.

As used herein, the term "document" includes but is not limited to any letter, intra-company communication, note, memorandum report, record, minutes of meetings, patent, patent application, printed publication, article, instruction, work assignment, notebook, draft, worksheet, drawing, sketch, photograph, chart, advertisement, catalog, brochure, news release, trade publication, invoice, program and any other written, recorded or graphic material however produced or reproduced, and, in the absence of the original, a copy thereof and any copy bearing markings thereon not present in the original or other copy thereof.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Notice of Deposition were served by mailing copies to the attorneys for the defendants:

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postage prepaid, this 2nd day of September, 1980.



Attorney for Plaintiff